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October 30, 2020

Via ECF

Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

Re: The Chefs' Warehouse, Inc. v. Employers Insurance Company of Wausau
Civil Action No.: 1:20-cv-04825-KPF

Dear Judge Failla:

We represent Defendant Employers Insurance Company of Wausau ("Wausau") in the above-referenced action. With the consent of Plaintiff, Wausau respectfully submits this letter motion requesting an 8-day extension of time to file an electronically stored information ("ESI") agreement.

Your Honor's Civil Case Management Plan and Scheduling Order (the "Order") entered on September 29, 2020, provides that any agreement reached between the parties concerning ESI is to be filed within 30 days from the date of the Order. See Dkt. No. 20. The parties have conferred and agree that a short amount of additional time is needed to reach a mutually agreeable ESI agreement. No other requests for extension of time have been sought, and the requested extension will not affect any of the other scheduled dates or impede the parties' ability to move forward with their discovery obligations. As such, the parties respectfully request that the deadline to file an ESI Agreement is extended to November 6, 2020.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

/s/ Christopher S. Finazzo

CHRISTOPHER S. FINAZZO

cc: John N. Ellison, Esq. (via ECF)

Application GRANTED.

Dated: October 30, 2020
 New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE